

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	)	
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Hadi PARTOVI et al.	)	<b>ATTN: Appeal Brief - Patents</b>
	)	
Serial No.: 09/523,853	)	Group Art Unit: 2141
	)	
Filed: March 13, 2000	)	Examiner: Q. Nguyen
	)	
For: CONTENT PERSONALIZATION OVER	)	
AN INTERFACE WITH ADAPTIVE	)	
VOICE CHARACTER	)	

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Customer Window, Mail Stop Appeal Brief - Patents  
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**APPEAL BRIEF**

This Appeal Brief is submitted in response to the final Office Action, dated June 19, 2006, in support of the Notice of Appeal, filed September 14, 2006, and in response to the Notice of Panel Decision from Pre-Appeal Brief Review, dated October 25, 2006.

I. **REAL PARTY IN INTEREST**

The real party in interest in this appeal is Tellme Networks, Inc.

II. **RELATED APPEALS, INTERFERENCES, AND JUDICIAL PROCEEDINGS**

Appellants are unaware of any related appeals, interferences, or judicial proceedings.

III. STATUS OF CLAIMS

Claims 1-25 have been canceled without prejudice or disclaimer.

Claims 26-52 are pending in this application.

Claims 26-32, 35-41, 44-48, 50, and 52 have been finally rejected under 35 U.S.C. § 102(e) as anticipated by Albal et al. (U.S. Patent Publication No. 2003/0147518).

Claims 33, 34, 42, 43, 49, and 51 have been finally rejected under 35 U.S.C. § 103(a) as unpatentable over Albal et al. in view of Ksiazek (U.S. Patent No. 6,597,765).

Claims 26-52 are the subject of the present appeal. These claims are reproduced in the Claim Appendix of this Appeal Brief.

IV. STATUS OF AMENDMENTS

An After Final Request for Reconsideration was filed subsequent to the final Office Action. The Examiner issued an Advisory Action, dated September 7, 2006, that indicated that the After Final Request for Reconsideration did not place the application in condition for allowance. A Pre-Appeal Brief Request for Review was subsequently filed on September 14, 2006. A Notice of Panel Decision from Pre-Appeal Brief Review was issued on October 25, 2006, and indicated that there is at least one actual issue for appeal.

V. SUMMARY OF CLAIMED SUBJECT MATTER

In the paragraphs that follow, each of the independent claims and the claims reciting means-plus-function or step-plus-function language that is involved in this appeal will be recited followed in parenthesis by examples of where support can be found in the specification and

drawings.

Independent claim 26 is directed to a method performed by a voice portal (Figures 1 and 2, 110). The method comprises receiving a call from a caller, where the call includes identifying information (Figure 5, 500 and 508; page 31, lines 10-12; page 36, lines 2-4 and 8-10); identifying a first voice character, based on the identifying information, to be used by the voice portal when audibly interacting with the caller (page 10, lines 1-7; page 16, line 21 - page 17, line 3; page 36, lines 4-10); detecting a speaking voice associated with the caller through the voice portal interaction with the caller (page 36, lines 11-18); identifying a second voice character based on the detected speaking voice associated with the caller (page 10, lines 1-7; page 36, lines 11-18); and changing from the first voice character to the second voice character when further audibly interacting with the caller (page 36, lines 11-18).

Independent claim 35 is directed to a system comprising means for receiving a call from a caller, where the call includes identifying information (Figures 1 and 2, 110; Figure 5, 500 and 508; page 31, lines 10-12; page 36, lines 2-4 and 8-10); means for identifying a voice character based on the identifying information (Figures 1 and 2, 110; page 10, lines 1-7; page 16, line 21 - page 17, line 3; page 36, lines 4-10); means for audibly interacting with the caller using the voice character (Figures 1 and 2, 110; page 36, lines 4-10); means for detecting a speaking voice associated with the caller when audibly interacting with the caller (Figures 1 and 2, 110; page 36, lines 11-18); means for identifying a different voice character based on the detected speaking voice associated with the caller (Figures 1 and 2, 110; page 10, lines 1-7; page 36, lines 11-18); and means for further audibly interacting with the caller using the different voice character (Figures 1 and 2, 110; page 36, lines 11-18).

Dependent claim 36 recites means for determining a locale associated with the call based on the identifying information (Figures 1 and 2, 110; page 36, lines 3-4).

Dependent claim 37 recites means for determining the voice character as a voice character associated with the determined locale (Figures 1 and 2, 110; page 36, lines 4-7).

Dependent claim 38 recites means for presenting prompts to the caller based on the determined locale (Figures 1 and 2, 110; page 36, lines 6-7).

Dependent claim 40 recites means for determining the voice character based on the determined type of communication device used by the caller (Figures 1 and 2, 110; page 36, lines 3-10).

Dependent claim 42 recites means for determining the different voice character based on the detected speaking voice associated with the caller and the determined actions of the caller (Figures 1 and 2, 110; page 36, lines 15-16).

Dependent claim 43 recites means for permitting the caller to select another voice character (Figures 1 and 2, 110; page 36, lines 17-18); and means for audibly interacting with the caller using the selected voice character (Figures 1 and 2, 110; page 36, lines 17-18).

Independent claim 44 is directed to a system comprising a voice portal (Figures 1 and 2, 110) to receive a call from a caller, where the call includes identifying information (Figure 5, 500 and 508; page 31, lines 10-12; page 36, lines 2-4 and 8-10), determine a locale associated with the caller based on the identifying information (page 36, lines 3-4 and 8-10), identify a voice character that is associated with the determined locale (page 36, lines 4-10), audibly interact with the caller using the voice character (page 36, lines 4-10), and switch from the voice character to a different voice character based on the audible interaction with the caller (page 36,

lines 11-18).

Independent claim 52 is directed to a method comprising receiving a call from a caller, where the call includes identifying information (Figure 5, 500 and 508; page 31, lines 10-12; page 36, lines 2-4 and 8-10); identifying a first voice character based on the identifying information (page 10, lines 1-7; page 36, lines 4-10); providing audible prompts to the caller in a speech pattern based on the first voice character (page 36, lines 4-10); detecting a speaking voice associated with the caller (page 36, lines 11-18); identifying a second voice character based on the detected speaking voice associated with the caller (page 10, lines 1-7; page 36, lines 11-18); and providing further audible prompts to the caller in a speech pattern based on the second voice character (page 36, lines 11-18).

#### VI. GROUND S OF REJECTION TO BE REVIEWED ON APPEAL

A. Claims 26-32, 35-41, 44-48, 50, and 52 stand finally rejected under 35 U.S.C. § 102(e) as anticipated by Albal et al.

B. Claims 33, 34, 42, 43, 49, and 51 stand finally rejected under 35 U.S.C. § 103(a) as unpatentable over Albal et al. in view of Ksiazek.

#### VII. ARGUMENT

##### **A. Rejection Under 35 U.S.C. § 102(e) Over Albal et al. (U.S. Patent Application Publication No. 2003/0147518).**

The initial burden of establishing a prima facie basis to deny patentability to a claimed invention is always upon the Examiner. In re Oetiker, 977 F.2d 1443, 24 USPQ2d 1443 (Fed.

Cir. 1992). For a proper rejection under 35 U.S.C. § 102, each and every element as set forth in the claim must be found in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 2 USPQ2d 1051 (Fed. Cir. 1987). Prior legal precedent requires that the identical invention be shown in as complete detail as is contained in the claim. Richardson v. Suzuki Motor Co., 868 F.2d 1226, 9 USPQ2d 1913 (Fed. Cir. 1989).

1. Claims 26, 30, and 32.

Independent claim 26 is directed to a method performed by a voice portal. The method comprises receiving a call from a caller, where the call includes identifying information; identifying a first voice character, based on the identifying information, to be used by the voice portal when audibly interacting with the caller; detecting a speaking voice associated with the caller through the voice portal interaction with the caller; identifying a second voice character based on the detected speaking voice associated with the caller; and changing from the first voice character to the second voice character when further audibly interacting with the caller.

Albal et al. does not disclose or suggest the combination of features recited in claim 26. For example, Albal et al. does not disclose or suggest identifying a first voice character, based on the identifying information, to be used by the voice portal when audibly interacting with the caller.

The Examiner alleged that Albal et al. discloses:

through the use of automatic number identification "ANI" or caller line identification "CLI", the communication 212 can automatically identify the user; after the communication node 212 verifies the call, the communication node 212 provides a greeting to the user "Hi, this is your personal agent, Maya, Welcome Bob. How may I help you?" via one of various dialog voice personalities, i.e., interacting with the caller via a first voice character

(emphasis in original) and cited paragraphs 0047-0048 of Albal et al. for support (Advisory

Action, page 3). Even assuming, for the sake of argument, that the Examiner's allegation is an accurate description of paragraphs 0047-0048 of Albal et al., the Examiner has not alleged that Albal et al. discloses identifying a first voice character, based on the identifying information, to be used by the voice portal when audibly interacting with the caller, as required by claim 26. Instead, the Examiner has simply alleged that Albal et al. discloses identifying a user based on ANI or CLI information and then interacting with the user via a particular voice personality (Advisory Action, page 3).

At paragraphs 0047 and 0048, Albal et al. discloses:

The node 212 can provide various dialog voice personalities (i.e., a female voice, a male voice, etc.) and can implement various grammars (i.e., vocabulary) to detect and respond to the audio inputs from the user. In addition, the communication node can automatically select various speech recognition models (i.e., an English model, a Spanish model, an English accent model, etc.) based upon a user profile, the user's communication device, and/or the user's speech patterns. The communication node 212 can also allow the user to select a particular speech recognition model.

When a user accesses the electronic network 206 from a communication device registered with the system (i.e., a user's home phone, work phone, cellular phone, etc.), the communication node 212 can by-pass a user screening option and automatically identify the user (or the type of the user's communication device) through the use of automatic number identification (ANI) or caller line identification (CLI). After the communication node verifies the call, the node provides a greeting to the user (i.e., "Hi, this is your personal agent, Maya. Welcome Bob. How may I help you?"). The communication node then enters into a dialogue with the user, and the user can select a variety of information offered by the communication node.

In these sections, Albal et al. discloses that node 212 can provide various dialog voice personalities and that after the node verifies a call, the node provides a greeting to the user.

Nowhere in these sections, or elsewhere, does Albal et al. disclose or remotely suggest identifying a first voice character, based on the identifying information, to be used by the voice portal when audibly interacting with the caller, as required by claim 26.

Albal et al. also does not disclose or suggest identifying a second voice character based

on a speaking voice detected through the voice portal interaction with the caller, as further recited in claim 26.

The Examiner alleged that Albal et al. discloses:

based on the user speech pattern determined/identified by the "ASR" 254 above, the communication node 212 can provide various dialog voice personalities and can implement various grammars/vocabulary to detect and respond to the audio inputs from the user, i.e., interacting with the caller in a second voice character based on the identified caller's speech pattern

(emphasis in original) and cited paragraphs 0047 and 0066 of Albal et al. for support (final Office Action, paragraph 5). Appellants respectfully submit that the Examiner's allegation finds no support in the Albal et al. disclosure. Nowhere does Albal et al. disclose or remotely suggest a communication node that provides various dialog voice personalities based on a user speech pattern determined/identified by the ASR, as alleged by the Examiner.

At paragraph 0047, Albal et al. discloses:

The node 212 can provide various dialog voice personalities (i.e., a female voice, a male voice, etc.) and can implement various grammars (i.e., vocabulary) to detect and respond to the audio inputs from the user. In addition, the communication node can automatically select various speech recognition models (i.e., an English model, a Spanish model, an English accent model, etc.) based upon a user profile, the user's communication device, and/or the user's speech patterns. The communication node 212 can also allow the user to select a particular speech recognition model.

In this section, Albal et al. discloses that node 212 can provide various dialog voice personalities, such as a female voice, a male voice, etc., and implement various grammars to detect and respond to the audio inputs from the user. Albal et al. also discloses that the communication node 212 can automatically select various speech recognition models (i.e., an English model, a Spanish model, an English accent model, etc.) based on a user profile, the user's communication device, and/or the user's speech patterns.

The Examiner appears to be equating the various dialog voice personalities disclosed in



Albal et al. to the first and second voice characters recited in claim 26. With this interpretation in mind, Albal et al. discloses that node 212 can provide various dialog voice personalities (i.e., a female voice, a male voice, etc.) (paragraph 0047). Nowhere does Albal et al. disclose or remotely suggest identifying a second dialog voice personality based on a speaking voice detected through the voice portal interaction with the caller, as would be required by claim 26.

If the Examiner is instead equating the various speech recognition models disclosed in Albal et al. to the first and second voice characters recited in claim 26, Appellants respectfully disagree. Appellants' specification defines the term "voice character" as all aspects of speech pronunciation including dialect, speed, volume, gender of speaker, pitch, language, voice talent used, actor, characteristics of speech, and/or other prosody values (page 16, lines 21-23). By contrast, a speech recognition model is used to recognize words spoken by a user (Albal et al., paragraph 0066). Therefore, a speech recognition model has a completely different function from that of a voice character. Accordingly, no reasonable allegation can be made that a speech recognition model is the same as a voice character. As such, nowhere in the above-identified section, or elsewhere, does Albal et al. disclose or remotely suggest identifying a second voice character based on a speaking voice detected through the voice portal interaction with the caller, as required by claim 26.

At paragraph 0066, Albal et al. discloses:

The ASR unit 254 of the VRU server 234 provides speaker dependent or independent automatic speech recognition of speech inputs or communications from the user. It is contemplated that the ASR unit 254 can include speaker dependent speech recognition. The ASR unit 254 processes the speech inputs from the user to determine whether a word or a speech pattern matches any of the grammars or vocabulary stored in the database server unit 244 or downloaded from the voice browser. When the ASR unit 254 identifies a selected speech pattern of the speech inputs, the ASR unit 254 sends an output signal to implement the specific function associated with the recognized voice pattern. The ASR

unit 254 is preferably a speaker independent speech recognition software package, Model No. RecServer, available from Nuance Communications. It is contemplated that the ASR unit 254 can be any suitable speech recognition unit to detect voice communications from a user.

In this section, Albal et al. discloses that ASR unit 254 identifies a selected speech pattern based on speech inputs from a user and sends an output signal to implement a specific function associated with the recognized voice pattern. Albal et al. discloses that this specific function might include a variety of services and features, such as voice dialing, voice paging, facsimiles, caller announcements, voice mails, reminders, call forwarding, call recording, content information, read e-mail, read calendars, read to-do lists, banking, v-commerce, e-commerce, etc. (paragraph 0050). None of these services or features remotely corresponds to identifying a second voice character, as required by claim 26. Thus, nowhere in the above-identified section, or elsewhere, does Albal et al. disclose or remotely suggest identifying a second voice character based on a speaking voice detected through the voice portal interaction with the caller, as required by claim 26.

The Examiner also alleged that:

one having ordinary skill in the art would have appreciated that the selected speech pattern of the user speech inputs identified by the "ASR" unit 254, i.e., referred as "the user's speech pattern", can be used/applied (to implement the specific functions associated with the recognized voice pattern) by the communication node 212 to select the appropriate dialog voice personality associated with the identified speech pattern from the user speech inputs.

(emphasis added) (Advisory Action, page 9). The Examiner's allegation is based solely on possibilities and impermissible hindsight reasoning, and falls short of establishing a proper rejection under 35 U.S.C. § 102. The mere allegation that something "can" occur in the Albal et al. system is insufficient for establishing a proper rejection under 35 U.S.C. § 102. There is simply nothing in the disclosure of Albal et al. that can reasonably be equated to identifying a

second voice character based on a speaking voice detected through the voice portal interaction with the caller, as required by claim 26. As explained above, the specific functions disclosed by Albal et al. that can be performed based on the words spoken by the user include a variety of services and features, such as voice dialing, voice paging, facsimiles, caller announcements, voice mails, reminders, call forwarding, call recording, content information, read e-mail, read calendars, read to-do lists, banking, v-commerce, e-commerce, etc. (paragraph 0050). None of these services or features remotely corresponds to identifying a second voice character, as required by claim 26. Thus, nowhere in the above-identified section, or elsewhere, does Albal et al. disclose or remotely suggest identifying a second voice character based on a speaking voice detected through the voice portal interaction with the caller, as required by claim 26.

The Examiner also alleged that:

after identifying a selected speech pattern of the speech inputs, the "ASR" unit 254 sends an output signal to implement the specific function associated with the recognized voice pattern and cited paragraph 0066 of Albal et al. for support (Advisory Action, page 3). This allegation falls short of curing the deficiencies in the Examiner's rejection noted above.

In paragraph 0066 (reproduced above), Albal et al. discloses that ASR unit 254 identifies a selected speech pattern (i.e., the words spoken by the user) based on speech inputs from the user and sends an output signal to implement a specific function associated with the recognized voice pattern. Albal et al. discloses that this specific function might include a variety of services and features, such as voice dialing, voice paging, facsimiles, caller announcements, voice mails, reminders, call forwarding, call recording, content information, read e-mail, read calendars, read to-do lists, banking, v-commerce, e-commerce, etc. (paragraph 0050). None of these services or features remotely corresponds to identifying a second voice character, as required by claim 26.

Thus, nowhere in the above-identified section, or elsewhere, does Albal et al. disclose or remotely suggest identifying a second voice character based on a speaking voice detected through the voice portal interaction with the caller, as required by claim 26.

Albal et al. also does not disclose or suggest changing from the first voice character to the second voice character when further audibly interacting with the caller, as further recited in claim 26. The Examiner alleged that Albal et al. discloses:

the application server 242 retrieves the information, processed the retrieved information and provides/outputs the information to the user according to one of various dialog voice personalities selected and provided by the communication node 212, i.e., outputs the information according to a second voice character based on the identified caller's speech pattern

(emphasis in original) and cited paragraphs 0047, 0066, and 0074 of Albal et al. for support (Advisory Action, page 4). Appellants respectfully disagree with the Examiner's interpretation of Albal et al.

Paragraph 0047 of Albal et al. is reproduced above. In this section, Albal et al. discloses that node 212 can provide various dialog voice personalities, such as a female voice, a male voice, etc., and implement various grammars to detect and respond to the audio inputs from the user. Albal et al. also discloses that the communication node 212 can automatically select various speech recognition models (i.e., an English model, a Spanish model, an English accent model, etc.) based on a user profile, the user's communication device, and/or the user's speech patterns.

The Examiner appears to be equating the various dialog voice personalities disclosed in Albal et al. to the first and second voice characters recited in claim 26. With this interpretation in mind, Albal et al. discloses that node 212 can provide various dialog voice personalities (i.e., a

female voice, a male voice, etc.) (paragraph 0047). Nowhere does Albal et al. disclose or remotely suggest changing from the first voice character to the second voice character when further audibly interacting with the caller, as required by claim 26.

If the Examiner is instead equating the various speech recognition models disclosed in Albal et al. to the first and second voice characters recited in claim 26, Appellants respectfully disagree. Appellants' specification defines the term "voice character" as all aspects of speech pronunciation including dialect, speed, volume, gender of speaker, pitch, language, voice talent used, actor, characteristics of speech, and/or other prosody values (page 16, lines 21-23). By contrast, a speech recognition model is used to recognize words spoken by a user (Albal et al., paragraph 0066). Therefore, a speech recognition model has a completely different function from that of a voice character. Accordingly, no reasonable allegation can be made that a speech recognition model is the same as a voice character. As such, nowhere in the above-identified section, or elsewhere, does Albal et al. disclose or remotely suggest changing from the first voice character to the second voice character when further audibly interacting with the caller, as further recited in claim 26.

Paragraph 0066 of Albal et al. is reproduced above. In this section, Albal et al. discloses that ASR unit 254 identifies a selected speech pattern based on speech inputs from a user and sends an output signal to implement a specific function associated with the recognized voice pattern. Albal et al. discloses that this specific function might include a variety of services and features, such as voice dialing, voice paging, facsimiles, caller announcements, voice mails, reminders, call forwarding, call recording, content information, read e-mail, read calendars, read to-do lists, banking, v-commerce, e-commerce, etc. (paragraph 0050). None of these services or

features remotely corresponds to changing from a first voice character to a second voice character when further audibly interacting with a caller, as required by claim 26.

At paragraph 0074, Albal et al. discloses:

The application server 242 of the communication node 212 is preferably connected to the LAN 240 and the content provider 209. The application server 242 allows the communication node 212 to access information from a destination of the information sources, such as the content providers and markup language servers. For example, the application server can retrieve information (i.e., weather reports, stock information, traffic reports, restaurants, flower shops, banks, calendars, "to-do" lists, e-commerce, etc.) from a destination of the information sources. This application server may include Starfish Software to provide the address book, calendar, and to-do lists and allow the user to organize information. The application server 242 processes the retrieved information and provides the information to the VRU server 234 and the voice browser 250. The VRU server 234 can provide an audio announcement to the user based upon the information using text-to-speech synthesizing or human recorded voice. The application server 242 can also send tasks or requests (i.e., transactional information) received from the user to the information sources (i.e., a request to place an order for a pizza). The application server 242 can further receive user inputs from the VRU server 234 based upon a speech recognition output. The application server is preferably a computer, such as an NT Windows compatible computer.

In this section, Albal et al. discloses that VRU server 234 can provide an audio announcement to the user based on information using text-to-speech synthesizing or a human recorded voice.

Nowhere in the above-identified section, or elsewhere, does Albal et al. disclose or remotely suggest changing from a first voice character to a second voice character when further audibly interacting with a caller, as required by claim 26.

The Examiner also alleged that

after receiving and processing the user speech inputs by the "ASR" 254 to determine the user's speech pattern and after retrieving the information, processing the retrieved information by the application server 242, the information is outputted to the user according to one of various dialog voice personalities selected and provided . . . by the communication node 212 (i.e., outputs the information according to a second voice character based on the identified caller's speech pattern)

(emphasis in original) (final Office Action, paragraph 17(B)). Appellants submit that the

Examiner's allegation is unreasonable and finds no support in the disclosure of Albal et al. There

is simply nothing in the disclosure of Albal et al. that can reasonably be equated to changing from a first voice character to a second voice character when further audibly interacting with the caller, as required by claim 26.

For at least these reasons, it is respectfully submitted that claims 26, 30, and 32 are not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claims 26, 30, and 32 is respectfully requested.

2. Claim 27.

Claim 27 recites determining a locale associated with the call based on the identifying information. Initially, claim 27 depends from claim 26. Therefore, claim 27 is not anticipated by Albal et al. for at least the reasons given with regard to claim 26.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 27.

The Examiner alleged that Albal et al. discloses:

based on the identified country code, area code and prefix that designates a particular geographic location, the caller's telephone number can identify a locale such as a city, state, region, country, and/or a particular place such as a hospital or a nursing home, etc., the communication node 212 can automatically select a voice character from various dialog voice personalities such as a female voice, a male voice, etc., based upon the identified particular geographic location from the caller telephone number, i.e., based upon the identified local to provide an appropriate greeting/prompt to the user "Hi, this is your personal agent, Maya, Welcome Bob. How may I help you?"

(emphasis in original) and cited paragraphs 0047 and 0048 of Albal et al. for support (final Office Action, paragraph 6). Appellants respectfully submit that the Examiner's allegation is based on probabilities and impermissible hindsight. While it may be true that a caller's telephone number can be used to identify a locale, nowhere does Albal et al. disclose or remotely suggest using a caller's telephone number to identify a locale, as alleged by the Examiner. Therefore,

Albal et al. does not disclose or suggest determining a locale associated with the call based on the identifying information, as required by claim 27.

Paragraphs 0047 and 0048 of Albal et al. are reproduced above. In these sections, Albal et al. discloses that node 212 can provide various dialog voice personalities and that after the node verifies a call, the node provides a greeting to the user. Nowhere in these sections, or elsewhere, does Albal et al. disclose or remotely suggest determining a locale associated with the call based on the identifying information, as required by claim 27.

For at least these reasons, it is respectfully submitted that claim 27 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 27 is respectfully requested.

3. Claim 28.

Claim 28 recites determining the first voice character as a voice character associated with a determined locale. Initially, claim 28 depends from claim 27. Therefore, claim 28 is not anticipated by Albal et al. for at least the reasons given with regard to claim 27.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 28.

The Examiner alleged that Albal et al. discloses:

based on the identified country code, area code and prefix that designates a particular geographic location, the caller's telephone number can identify a locale such as a city, state, region, country, and/or a particular place such as a hospital or a nursing home, etc., the communication node 212 can automatically select a voice character from various dialog voice personalities such as a female voice, a male voice, etc., based upon the identified particular geographic location from the caller telephone number, i.e., based upon the identified local to provide an appropriate greeting/prompt to the user "Hi, this is your personal agent, Maya, Welcome Bob. How may I help you?"

(emphasis in original) and cited paragraphs 0047 and 0048 of Albal et al. for support (final



Office Action, paragraph 6). Appellants respectfully submit that the Examiner's allegation finds no support in the disclosure of Albal et al. Albal et al. discloses various dialog voice personalities, but does not disclose or remotely suggest that a dialog voice personality is automatically selected based on an identified locale or even automatic number identification (ANI) or caller line identification (CLI) information, as alleged by the Examiner.

Paragraphs 0047 and 0048 of Albal et al. are reproduced above. In these sections, Albal et al. discloses that node 212 can provide various dialog voice personalities and that after the node verifies a call, the node provides a greeting to the user. Nowhere in these sections, or elsewhere, does Albal et al. disclose or remotely suggest determining the first voice character as a voice character associated with a determined locale, as required by claim 28.

For at least these reasons, it is respectfully submitted that claim 28 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 28 is respectfully requested.

4. Claim 29.

Claim 29 recites presenting prompts to the caller based on the determined locale. Initially, claim 29 depends from claim 27. Therefore, claim 29 is not anticipated by Albal et al. for at least the reasons given with regard to claim 27.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 29.

The Examiner alleged that Albal et al. discloses:

based on the identified country code, area code and prefix that designates a particular geographic location, the caller's telephone number can identify a locale such as a city, state, region, country, and/or a particular place such as a hospital or a nursing home, etc., the communication node 212 can automatically select a voice character from various

dialog voice personalities such as a female voice, a male voice, etc., based upon the identified particular geographic location from the caller telephone number, i.e., based upon the identified local to provide an appropriate greeting/prompt to the user "Hi, this is your personal agent, Maya, Welcome Bob. How may I help you?"

(emphasis in original) and cited paragraphs 0047 and 0048 of Albal et al. for support (final Office Action, paragraph 6). Appellants respectfully submit that the Examiner's allegation finds no support in the disclosure of Albal et al. Albal et al. discloses providing a greeting to a user, but does not disclose or remotely suggest that a greeting is provided based on an identified locale, as alleged by the Examiner.

Paragraphs 0047 and 0048, of Albal et al. are reproduced above. In these sections, Albal et al. discloses that node 212 can provide various dialog voice personalities and that after the node verifies a call, the node provides a greeting to the user. Nowhere in these sections, or elsewhere, does Albal et al. disclose or remotely suggest presenting prompts to the caller based on a determined locale, as required by claim 29.

For at least these reasons, it is respectfully submitted that claim 29 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 29 is respectfully requested.

5. Claim 31.

Claim 31 recites determining the first voice character based on the determined type of communication device used by the caller. Initially, claim 27 depends from claim 26. Therefore, claim 27 is not anticipated by Albal et al. for at least the reasons given with regard to claim 26.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 31.

The Examiner alleged that Albal et al. discloses:

the communication node 212 can automatically select a voice character from various dialog voice personalities and/or select various speech recognition models based upon the user's communication device

and cited paragraphs 0047 and 0048 of Albal et al. for support (final Office Action, paragraph 8).

Appellants respectfully submit that the Examiner's allegation lacks merit. As explained above, Appellants submit that it is unreasonable to equate a speech recognition model with a voice character. Albal et al. discloses various voice personalities, but does not disclose or remotely suggest that a voice personality is selected based on the user's communication device, as alleged by the Examiner.

Paragraphs 0047 and 0048, of Albal et al. are reproduced above. In these sections, Albal et al. discloses that node 212 can provide various dialog voice personalities and that after the node verifies a call, the node provides a greeting to the user. Nowhere in these sections, or elsewhere, does Albal et al. disclose or remotely suggest determining the first voice character based on the determined type of communication device used by the caller, as required by claim 31.

For at least these reasons, it is respectfully submitted that claim 31 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 31 is respectfully requested.

6. Claims 35, 39, and 41.

Independent claim 35 is directed to a system comprising means for receiving a call from a caller, where the call includes identifying information; means for identifying a voice character based on the identifying information; means for audibly interacting with the caller using the voice character; means for detecting a speaking voice associated with the caller when audibly

interacting with the caller; means for identifying a different voice character based on the detected speaking voice associated with the caller; and means for further audibly interacting with the caller using the different voice character.

Albal et al. does not disclose or suggest the combination of features recited in claim 35. For example, Albal et al. does not disclose or suggest means for identifying a voice character based on the identifying information. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claim 26 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 26.

Albal et al. also does not disclose or suggest means for identifying a different voice character based on the detected speaking voice associated with the caller, as further recited in claim 35. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claim 26 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 26.

Albal et al. also does not disclose or suggest means for further audibly interacting with the caller using the different voice character, as further recited in claim 35. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claim 26 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 26.

For at least these reasons, it is respectfully submitted that claims 35, 39, and 41 are not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claims 35, 39, and

41 is respectfully requested.

7. Claim 36.

Claim 36 recites means for determining a locale associated with the call based on the identifying information. Initially, claim 36 depends from claim 35. Therefore, claim 36 is not anticipated by Albal et al. for at least the reasons given with regard to claim 35.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 36.

The Examiner rejected claim 36 by generally referring to the rejection of claim 27 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 27.

For at least these reasons, it is respectfully submitted that claim 36 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 36 is respectfully requested.

8. Claim 37.

Claim 37 recites means for determining the voice character as a voice character associated with the determined locale. Initially, claim 37 depends from claim 36. Therefore, claim 37 is not anticipated by Albal et al. for at least the reasons given with regard to claim 36.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 37.

The Examiner rejected claim 37 by generally referring to the rejection of claim 28 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 28.

For at least these reasons, it is respectfully submitted that claim 37 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 37 is respectfully requested.

9. Claim 38.

Claim 38 recites means for presenting prompts to the caller based on the determined locale. Initially, claim 38 depends from claim 36. Therefore, claim 38 is not anticipated by Albal et al. for at least the reasons given with regard to claim 36.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 38.

The Examiner rejected claim 38 by generally referring to the rejection of claim 29 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 29.

For at least these reasons, it is respectfully submitted that claim 38 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 38 is respectfully requested.

10. Claim 40.

Claim 40 recites means for determining the voice character based on the determined type of communication device used by the caller. Initially, claim 40 depends from claim 35. Therefore, claim 40 is not anticipated by Albal et al. for at least the reasons given with regard to claim 35.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 40.

The Examiner rejected claim 40 by generally referring to the rejection of claim 31 (Advisory Action, paragraph 14). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 31.

For at least these reasons, it is respectfully submitted that claim 40 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 40 is respectfully requested.

11. Claims 44, 46, and 48.

Independent claim 44 is directed to a system comprising a voice portal to receive a call from a caller, where the call includes identifying information, determine a locale associated with the caller based on the identifying information, identify a voice character that is associated with the determined locale, audibly interact with the caller using the voice character, and switch from the voice character to a different voice character based on the audible interaction with the caller.

Albal et al. does not disclose or suggest the combination of features recited in claim 44. For example, Albal et al. does not disclose or suggest a voice portal to determine a locale associated with the caller based on the identifying information. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claims 35-43 (Advisory Action, paragraph 15). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 36.

Albal et al. also does not disclose or suggest a voice portal to identify a voice character that is associated with the determined locale, as further recited in claim 44. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claims 35-43 (Advisory Action, paragraph 15). Appellants respectfully submit that the Examiner's rejection

lacks merit for at least reasons similar to reasons given with regard to claim 37.

Albal et al. also does not disclose or suggest a voice portal to switch from the voice character to a different voice character based on the audible interaction with the caller, as further recited in claim 44. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claims 35-43 (Advisory Action, paragraph 15). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 35.

For at least these reasons, it is respectfully submitted that claims 44, 46, and 48 are not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claims 44, 46, and 48 is respectfully requested.

12. Claim 45.

Claim 45 recites that the voice portal is configured to present audible prompts to the caller based on the determined locale. Initially, claim 45 depends from claim 44. Therefore, claim 45 is not anticipated by Albal et al. for at least the reasons given with regard to claim 44.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 45.

The Examiner rejected claim 45 by generally referring to the rejection of claims 35-43 (Advisory Action, paragraph 15). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 38.

For at least these reasons, it is respectfully submitted that claim 45 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 45 is respectfully requested.



## 13. Claim 47.

Claim 47 recites that the voice portal is configured to determine the voice character based on the determined type of communication device used by the caller. Initially, claim 47 depends from claim 44. Therefore, claim 47 is not anticipated by Albal et al. for at least the reasons given with regard to claim 44.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 47.

The Examiner rejected claim 47 by generally referring to the rejection of claims 35-43 (Advisory Action, paragraph 15). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 40.

For at least these reasons, it is respectfully submitted that claim 47 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 47 is respectfully requested.

## 14. Claim 50.

Claim 50 recites that the voice portal is configured to detect a speaking voice associated with the caller while audibly interacting with the caller, and determine the different voice character based on the detected speaking voice. Initially, claim 50 depends from claim 44. Therefore, claim 50 is not anticipated by Albal et al. for at least the reasons given with regard to claim 44.

Further, Albal et al. does not disclose or suggest the combination of features recited in claim 50.

The Examiner rejected claim 50 by generally referring to the rejection of claims 35-43

(Advisory Action, paragraph 15). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 35.

For at least these reasons, it is respectfully submitted that claim 50 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 50 is respectfully requested.

14. Claim 52.

Independent claim 52 is directed to a method comprising receiving a call from a caller, where the call includes identifying information; identifying a first voice character based on the identifying information; providing audible prompts to the caller in a speech pattern based on the first voice character; detecting a speaking voice associated with the caller; identifying a second voice character based on the detected speaking voice associated with the caller; and providing further audible prompts to the caller in a speech pattern based on the second voice character.

Albal et al. does not disclose or suggest the combination of features recited in claim 52. For example, Albal et al. does not disclose or suggest identifying a first voice character based on the identifying information. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claim 26 (Advisory Action, paragraph 16). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 26.

Albal et al. also does not disclose or suggest identifying a second voice character based on the detected speaking voice associated with the caller, as further recited in claim 52. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claim 26 (Advisory Action, paragraph 16). Appellants respectfully submit that the Examiner's

rejection lacks merit for at least reasons similar to reasons given with regard to claim 26.

Albal et al. also does not disclose or suggest providing further audible prompts to the caller in a speech pattern based on the second voice character, as further recited in claim 52. The Examiner rejected this claim feature by generally referring to the Examiner's rejection of claim 26 (Advisory Action, paragraph 16). Appellants respectfully submit that the Examiner's rejection lacks merit for at least reasons similar to reasons given with regard to claim 26.

For at least these reasons, it is respectfully submitted that claim 52 is not anticipated by Albal et al. under 35 U.S.C. § 102. Reversal of the rejection of claim 52 is respectfully requested.

**B. Rejection Under 35 U.S.C. § 103(a) Over Albal et al. (U.S. Patent Application Publication No. 2003/0147518) in View of Ksiazek (U.S. Patent No. 6,597,765).**

The initial burden of establishing a prima facie basis to deny patentability to a claimed invention is always upon the Examiner. In re Oetiker, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). In rejecting a claim under 35 U.S.C. § 103, the Examiner must provide a factual basis to support the conclusion of obviousness. In re Warner, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967). Based upon the objective evidence of record, the Examiner is required to make the factual inquiries mandated by Graham v. John Deere Co., 86 S.Ct. 684, 383 U.S. 1, 148 USPQ 459 (1966). The Examiner is also required to explain how and why one having ordinary skill in the art would have been led to modify an applied reference and/or combine applied references to arrive at the claimed invention. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988).

In establishing motivation, it has been consistently held that the requisite motivation to support the conclusion of obviousness is not an abstract concept, but must stem from the prior art as a whole to impel one having ordinary skill in the art to modify a reference or combine references with a reasonable expectation of successfully achieving some particular realistic objective. See, for example, Interconnect Planning Corp. v. Feil, 227 F.2d 1132, 227 USPQ 543 (Fed. Cir. 1985).

1. Claim 33.

Claim 33 recites determining the second voice character based on the detected speaking voice associated with the caller and the determined actions of the caller. Claim 33 depends from claim 26. Without acquiescing in the Examiner's rejection of claim 33, Appellants respectfully submit that the disclosure of Ksiazek does not cure the deficiencies in the disclosure of Albal et al. identified above with regard to claim 26. Therefore, claim 33 is patentable over Albal et al. and Ksiazek, whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 26.

For at least these reasons, it is respectfully submitted that claim 33 is patentable over Albal et al. and Ksiazek under 35 U.S.C. § 103. Reversal of the rejection of claim 33 is respectfully requested.

2. Claim 34.

Claim 34 recites permitting the caller to select a third voice character; and changing from the second voice character to the third voice character when further audibly interacting with the caller. Claim 34 depends from claim 26. Without acquiescing in the Examiner's rejection of claim 34, Appellants respectfully submit that the disclosure of Ksiazek does not cure the

deficiencies in the disclosure of Albal et al. identified above with regard to claim 26. Therefore, claim 34 is patentable over Albal et al. and Ksiazek, whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 26.

For at least these reasons, it is respectfully submitted that claim 34 is patentable over Albal et al. and Ksiazek under 35 U.S.C. § 103. Reversal of the rejection of claim 34 is respectfully requested.

3. Claim 42.

Claim 42 recites means for determining the different voice character based on the detected speaking voice associated with the caller and the determined actions of the caller. Claim 42 depends from claim 35. Without acquiescing in the Examiner's rejection of claim 42, Appellants respectfully submit that the disclosure of Ksiazek does not cure the deficiencies in the disclosure of Albal et al. identified above with regard to claim 35. Therefore, claim 42 is patentable over Albal et al. and Ksiazek, whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 35.

For at least these reasons, it is respectfully submitted that claim 42 is patentable over Albal et al. and Ksiazek under 35 U.S.C. § 103. Reversal of the rejection of claim 42 is respectfully requested.

4. Claim 43.

Claim 43 recites means for permitting the caller to select another voice character; and means for audibly interacting with the caller using the selected voice character. Claim 43 depends from claim 35. Without acquiescing in the Examiner's rejection of claim 43, Appellants respectfully submit that the disclosure of Ksiazek does not cure the deficiencies in the disclosure

of Albal et al. identified above with regard to claim 35. Therefore, claim 43 is patentable over Albal et al. and Ksiazek, whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 35.

For at least these reasons, it is respectfully submitted that claim 43 is patentable over Albal et al. and Ksiazek under 35 U.S.C. § 103. Reversal of the rejection of claim 43 is respectfully requested.

5. Claim 49.

Claim 49 recites that the voice portal is further configured to determine the different voice character based on the determined actions of the caller. Claim 49 depends from claim 44. Without acquiescing in the Examiner's rejection of claim 49, Appellants respectfully submit that the disclosure of Ksiazek does not cure the deficiencies in the disclosure of Albal et al. identified above with regard to claim 44. Therefore, claim 49 is patentable over Albal et al. and Ksiazek, whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 44.

For at least these reasons, it is respectfully submitted that claim 49 is patentable over Albal et al. and Ksiazek under 35 U.S.C. § 103. Reversal of the rejection of claim 49 is respectfully requested.

6. Claim 51.

Claim 51 recites that the voice portal is further configured to permit the caller to select the different voice character. Claim 51 depends from claim 44. Without acquiescing in the Examiner's rejection of claim 51, Appellants respectfully submit that the disclosure of Ksiazek does not cure the deficiencies in the disclosure of Albal et al. identified above with regard to

claim 44. Therefore, claim 51 is patentable over Albal et al. and Ksiazek, whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 44.

For at least these reasons, it is respectfully submitted that claim 51 is patentable over Albal et al. and Ksiazek under 35 U.S.C. § 103. Reversal of the rejection of claim 51 is respectfully requested.

#### VIII. CONCLUSION

In view of the foregoing arguments, Appellants respectfully solicit the Honorable Board to reverse the Examiner's rejections of claims 26-52 under 35 U.S.C. §§ 102 and 103.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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CLAIM APPENDIX

26. A method performed by a voice portal, comprising:

receiving a call from a caller, where the call includes identifying information;

identifying a first voice character, based on the identifying information, to be used by the voice portal when audibly interacting with the caller;

detecting a speaking voice associated with the caller through the voice portal interaction with the caller;

identifying a second voice character based on the detected speaking voice associated with the caller; and

changing from the first voice character to the second voice character when further audibly interacting with the caller.

27. The method of claim 26, further comprising:

determining a locale associated with the call based on the identifying information.

28. The method of claim 27, wherein identifying a first voice character includes:

determining the first voice character as a voice character associated with the determined locale.

29. The method of claim 27, further comprising:

presenting prompts to the caller based on the determined locale.

30. The method of claim 26, further comprising:  
determining a type of communication device used by the caller based on the identifying information.

31. The method of claim 30, wherein identifying a first voice character includes:  
determining the first voice character based on the determined type of communication device used by the caller.

32. The method of claim 26, further comprising:  
determining actions of the caller during the voice portal interaction with the caller.

33. The method of claim 32, wherein identifying a second voice character includes:  
determining the second voice character based on the detected speaking voice associated with the caller and the determined actions of the caller.

34. The method of claim 26, further comprising:  
permitting the caller to select a third voice character; and  
changing from the second voice character to the third voice character when further audibly interacting with the caller.

35. A system, comprising:  
means for receiving a call from a caller, where the call includes identifying information;

means for identifying a voice character based on the identifying information;

means for audibly interacting with the caller using the voice character;

means for detecting a speaking voice associated with the caller when audibly interacting with the caller;

means for identifying a different voice character based on the detected speaking voice associated with the caller; and

means for further audibly interacting with the caller using the different voice character.

36. The system of claim 35, further comprising:

means for determining a locale associated with the call based on the identifying information.

37. The system of claim 36, wherein the means for identifying a voice character includes:

means for determining the voice character as a voice character associated with the determined locale.

38. The system of claim 36, further comprising:

means for presenting prompts to the caller based on the determined locale.

39. The system of claim 35, further comprising:

means for determining a type of communication device used by the caller based on the

identifying information.

40. The system of claim 39, wherein the means for identifying a voice character includes:

means for determining the voice character based on the determined type of communication device used by the caller.

41. The system of claim 35, further comprising:  
means for determining actions of the caller during the audible interaction with the caller.

42. The system of claim 41, wherein the means for identifying a different voice character includes:  
means for determining the different voice character based on the detected speaking voice associated with the caller and the determined actions of the caller.

43. The system of claim 35, further comprising:  
means for permitting the caller to select another voice character; and  
means for audibly interacting with the caller using the selected voice character.

44. A system, comprising:  
a voice portal to:  
receive a call from a caller, where the call includes identifying information,

determine a locale associated with the caller based on the identifying information, identify a voice character that is associated with the determined locale, audibly interact with the caller using the voice character, and switch from the voice character to a different voice character based on the audible interaction with the caller.

45. The system of claim 44, wherein the voice portal is configured to present audible prompts to the caller based on the determined locale.

46. The system of claim 44, wherein the voice portal is further configured to determine a type of communication device used by the caller.

47. The system of claim 46, wherein when identifying a voice character, the voice portal is configured to determine the voice character based on the determined type of communication device used by the caller.

48. The system of claim 44, wherein the voice portal is further configured to determine actions of the caller while audibly interacting with the caller.

49. The system of claim 48, wherein the voice portal is further configured to determine the different voice character based on the determined actions of the caller.

50. The system of claim 44, wherein the voice portal is further configured to:  
detect a speaking voice associated with the caller while audibly interacting with the caller, and  
determine the different voice character based on the detected speaking voice.

51. The system of claim 44, wherein the voice portal is further configured to:  
permit the caller to select the different voice character.

52. A method, comprising:  
receiving a call from a caller, where the call includes identifying information;  
identifying a first voice character based on the identifying information;  
providing audible prompts to the caller in a speech pattern based on the first voice character;  
detecting a speaking voice associated with the caller;  
identifying a second voice character based on the detected speaking voice associated with the caller; and  
providing further audible prompts to the caller in a speech pattern based on the second voice character.

EVIDENCE APPENDIX

None

RELATED PROCEEDINGS APPENDIX

None